



RECEIVED  
E+H  
AUG 07 1989

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

PHONE 509/924-1911

# INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE  
SPOKANE, WASHINGTON 99212-2099

July 28, 1989

8-16-89  
Called & left message -  
response rec'd & is  
satisfactory. EEB

Mr. Gil Haselberger, Chief  
Toxic Substances Section  
U. S. Environmental Protection Agency  
Region 10  
1200 Sixth Ave.  
Seattle, WA 98101

Re: AT-083

Dear Mr. Haselberger:

This letter is in response to the Notice of Noncompliance received from your office, dated July 5, 1989, pertaining to PCB regulations pursuant to the Toxic Substances Control Act (TSCA). Two violations were noted by Michael R. Hoyles during an inspection at the Inland Empire Paper Company (IEP) facility on April 20, 1989. The violations that were outlined, along with IEP's responses are as follows:

1. "Inland Empire Paper Company failed to prepare annual reports for the years 1983-1987, during which time the facility had in use more than 50 large PCB capacitors."

Inland Empire has prepared annual reports for the years in question and these are attached. Also included, although not requested, is the annual report for 1988 which summarizes the information regarding the disposal of the capacitors removed from service in 1987 that were properly disposed of in 1988. In addition, included is a copy of the equipment log from which the majority of the annual report information is derived.

2. "The inspector also noted that the PCB labels used to mark the location of PCB capacitors were not of regulation 6-inch square size. Full-size (6-inch by 6-inch) labels are required whenever the piece of equipment -- or, in this case, the capacitor rack -- is of adequate size to carry these labels."

Inland Empire Paper Company

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SUBSTANCES BRANCH  
EPA REGION 10

Mr. Gil Haselberger  
July 28, 1989  
Page 2

Mr. Hoyles did point out during his inspection that the labels on IEP's remaining 30 PCB capacitor bank were not of the legal 6-inch by 6-inch size. I told him that EPA's Dr. Watson, in a December 15, 1983 PCB inspection had made the same observation, but had told us that due to the physical size of the capacitors that the smaller labels were acceptable. IEP was not cited at that time for this discrepancy. However, in light of the most recent inspector's findings, IEP, as of this writing, has installed the larger 6-inch labels on the sides of the capacitor rack.

In reference to your recommendation that IEP should consider replacing the 30 remaining PCB capacitors at the site with equivalent non-PCB models, this presently is under review. It has been a long term goal of our company to become a PCB free mill, and we are optimistic of achieving this goal in 1990.

I hope that the preceding information and attachments return our mill to compliance. If any further information is required, please contact me at (509) 924-1911.

Sincerely,

*Wayne Andresen*

Wayne Andresen  
Assistant General Manager

mb

Encls.

RECEIVED

AUG 07 1988

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 88 THRU DEC. 31, 88.

As of December 31, 1988, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year:

30 Capacitors ---- Page 2 of Equipment Log, Item #4.

There were no PCB's in storage.

Incinerated at Rollins Environmental Services, Inc. in Deer Park, Texas, were the following items removed and reported in 1987:

On April 18, 1988, under Texas Waste Manifest Ticket #00354357, Page 2 of the Equipment Log, Items 1, 2, 3, 5, 6, 7, and 9 plus the 3 amp guard switches.

There was no storage or disposal of PCB's during this reporting period.

Signature Wayne Andersen

Title Asst. Gen. Mgr.

RECEIVED

AUG 07 1988

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 87 THRU DEC. 31, 87.

As of December 31, 1987, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year:

30 Capacitors ---- Page 2 of Equipment Log, Item #4.

Removed from service with times in storage were the following capacitors:

Item #6, Page 2 of Equipment Log, Jan. 1 - Sept. 28, 1987 (capacitors)

Items #1 - 3, Page 2 of Equipment Log, Nov. 19 - Nov. 23, 1987 (capacitors)

Items #5, 7, and 9, Page 2 of Equipment Log, Nov. 19 - Nov. 23, 1987 (capacitors)

Also, the following 3 amp guard switches, not previously known to contain PCB's were tested and removed and stored as follows:

Item #10 ---- Page 2 of Equipment Log ---- Oct. 20 - Nov. 23, 1987 (switch)

Item #11 ---- Page 2 of Equipment Log ---- Oct. 28 - Nov. 23, 1987 (switch)

Item #2 ---- Page 2 of Equipment Log ---- Nov. 5 - Nov. 23, 1987 (switch)

All of the preceeding were stored by Eastern Electric apparatus Repair in Seattle through the end of 1987.

Signature Wm. J. Anderson

Title Production Manager

RECEIVED

AUG 07 1989

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 86 THRU DEC. 31, 86.

As of December 31, 1986, we had on hand at our Inland Empire Paper Co.  
facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use on site:

36 Capacitors ---- Page 2 of Equipment Log, Items 1 -3.

30 Capacitors ---- Page 2 of Equipment Log, Item #4.

3 Capacitors ---- Page 2 of Equipment Log, Items 5, 7, & 9.

Removed from service on September 23, 1986, and in storage at the end of the  
year was one capacitor, Item #6, Page 2 of the Equipment Log.

Signature Wayne Anderson

Title Technical Supt.

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AUG 07 1985

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 85 THRU DEC. 31, 85.

As of December 31, 1985, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use on site:

36 Capacitors ---- Page 2 of Equipment Log, Items 1 - 3.

30 Capacitors ---- Page 2 of Equipment Log, Item #4.

4 Capacitors ---- Page 2 of Equipment Log, Items 5, 6, 7, & 9.

There was no storage or disposal of PCB's during this reporting period.

Signature

Wayne Anderson

Title

Technical Supt.

RECEIVED

AUG 07 1989

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 84 THRU DEC. 31, 84.

As of December 31, 1984, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following PCB's were on site:

36 Capacitors ---- Page 2 of Equipment Log, Items 1 - 3.

30 Capacitors ---- Page 2 of Equipment Log, Item 4.

4 Capacitors ---- Page 2 of Equipment Log, Items 5, 6, 7, & 9.

Item #8, of Equipment Log, Page 2, in storage at the end of 1983, was disposed of on March 11, 1984 at Rollins Environmental Services, Deer Park, Texas. Texas Waste Manifest Ticket #00804851.

Items #8 and #14 of Page 1, Equipment Log, were decontaminated by Westinghouse on January 26, 1984, certified PCB free on May 21, 1984 by Laucks Testing Lab. The contaminated oil, 9702.46 kg, was incinerated at Rollins Environmental Services in Deer Park, Texas on March 12, 1984 under Texas Waste Manifest Ticket #00804718.

Signature Wayne Anderson

Title Technical Superintendent

RECEIVED

AUG 07 1989

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 83 THRU DEC. 31, 83.

As of December 31, 1983, we had on hand at our Inland Empire Paper Co. facility 3172 kilograms of PCB insulating fluids. The PCB fluid was located as follows:

Page 1 ---- 2 Transformers	(Items 8 & 14 of Equipment Log)
Page 2 ---- 36 Capacitors	(Items 1 - 3 of Equipment Log)
Page 2 ---- 30 Capacitors	(Item #4 of Equipment Log)
Page 2 ---- 5 Capacitors	(Items 5 - 9 of Equipment Log)

Item #8 of Page 2, GE Capacitor was placed in storage on 11/9/83.

Signature Wesley Anderson  
Title Technical Supt.





• ASKRAL - 12.5 LBS/GAL.  
OIL - 7.5 LBS/GAL.  
(2.2 LBS/KG.)  
ISE TN-223(9/79)



INSTALLATION & SERVICE  
ENGINEERING DIVISION

## PCB LOG SHEET EQUIPMENT IN SERVICE

ITEM NO.	DATE LISTED	EQUIPMENT	CLASSIFICATION PCB PCB CONTAM NON PCB	EQUIPMENT LOCATION	TOTAL PCB WEIGHT (KG)*	DATE TO STORAGE/ DISPOSAL	STORAGE/ DISPOSAL FACILITY LOCATION	COMMENTS
1	2/11 1980	Capacitor GE 180 KVAR 2300-V	PCB Contam.	South Sta. Annex	-	11/19/87 - 11/23/87	DEER PARK, TX ON 4/18/88 #00354357	12 cans of 1 gal cap.
2	"	"	"	Middle Sta. Annex	-	"	"	"
3	"	"	"	North Sta. Annex	-	"	"	"
4	"	"	"	Station Annex	-	- IN SERVICE -	-	30 capacitors of 100 KVAR
5	4/15 1982	Capacitor GE 300 KVA 4100-V	"	Refiner MCC	-	11/19/87 - 11/23/87	DEER PARK, TX ON 4/18/88 #00354357	#1 Sec. Refiner
6	"	"	"	"	-	9/23/86 - 9/29/87	DEER PARK, TX ON 4/18/88 #00354357	#2 Sec. Refiner
7	"	"	"	"	-	11/19/87 - 11/23/87	"	#3 Sec. Refiner
8	"	"	"	"	-	11/19/87 - 11/23/87	DEER PARK, TX ON 3/11/84 #00304851	#4 Sec. Refiner
9	11/14 1982	Capacitor - W T-3 Refiner 4160 Volt	"	"	-	11/19/87 - 11/23/87	DEER PARK, TX ON 3/11/88 #00304851	4160 Refiner
10	11/5 1987	Amp Guard Switch Surge Capacitor 4160-Volt	"	"	-	10/20/87 - 11/23/87	"	Surge Suppressor
11	"	Amp Guard Switch	"	"	-	10/20/87 - 11/23/87	"	Amp Guard Switches
12	"	S-1 Refiner 4160 Volt Amp Guard Switch	"	"	-	11/5/87 - 11/23/87	"	"

\* ASKAL - 12.5 LBS/GAL.  
OIL - 7.5 LBS/GAL.  
(2.2 LBS/KG.)  
ISE TN-223(8/79)

GENERAL ELECTRIC

Firm



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

JUL 05 1989

REPLY TO  
ATTN OF: AT-083

CERTIFIED MAIL

NOTICE OF NONCOMPLIANCE  
RETURN RECEIPT REQUESTED

Mr. Wayne Andresen, Production Manager  
Inland Empire Paper Company  
North 3320 Argonne  
Spokane, Washington 99212

Dear Mr. Andresen:

This concerns the April 20, 1989 Environmental Protection Agency (EPA) inspection which was performed by Michael R. Hoyles at your facility in order to determine compliance with the PCB regulations adopted by the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA).

During the inspection, violations of the regulations were noted. You should be aware that violations of TSCA may be subject to administrative civil penalties. I understand that Mr. Hoyles discussed his preliminary findings with you at the conclusion of the inspection. The following identifies in detail the violations observed during the inspection.

REGULATION - RECORDKEEPING (ANNUAL REPORTS)

40 C.F.R. § 761.180(a) requires that facilities using or storing at one time 45 kilograms of PCBs in PCB Containers, or 50 or more large PCB Capacitors, or one or more PCB Transformers, maintain supporting documentation and a specified format annual report of information on the disposition of PCBs and PCB Items.

VIOLATIONS

Inland Empire Paper Company failed to prepare annual reports for the years 1983-1987, during which time the facility had in use more than 50 large PCB Capacitors.

The inspector also noted that the PCB labels used to mark the location of PCB Capacitors were not of regulation 6-inch square size. Full-size (6-inch by 6-inch) labels are required whenever the piece of equipment -- or in this case, the capacitor rack -- is of adequate size to carry these labels.

The inspection report also noted that 30 large PCB Capacitors remain in service at your facility. Although this number of large PCB Capacitors does not trigger the annual reporting requirements, this equipment is still regulated under the provisions of TSCA. Any leakage or spill from a PCB Capacitor must be responded to in accordance with the PCB Spill Cleanup Policy, and large PCB Capacitors removed from service must be disposed of by approved high-temperature incineration in accordance with disposal provisions of the PCB Regulations. We recommend that you consider replacing the large PCB Capacitors with equivalent non-PCB models.

Within 30 days of your receipt of this letter, please furnish us with summary compilations of annual reports for your facility for the years 1983-1987. Please call Elaine Barrick at (206) 442-8577 if you have questions.

Sincerely,

*Gil Haselberger*  
Gil Haselberger, Chief  
Toxic Substances Section

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: WAYNE ANDRESEN, PRODUCTION MANAGER INLAND EMPIRE PAPER CO. N 3320 ARGONNE SPOKANE WA 99212	4. Article Number P 751 263 752
5. Signature - Address X <i>Willam M. Hedgebeth</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid) Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 7/17/89	

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 751 263 752

**RECEIPT FOR CERTIFIED MAIL**  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to WAYNE ANDRESEN, PRODUCTION MGR.
Street and No. INLAND EMPIRE PAPER CO.
P.O. State and Zip N 2230 ARGONNE
Post Office SPOKANE WA 99212
Certified Fee
Special Delivery Fee
Restricted Delivery Fee
Return Receipt showing to whom and Date Delivered
Return Receipt showing to whom, Date, and Address of Delivery
TOTAL Postage and Fees \$
Postmark or Date 07 05 89

PS Form 3800, June 1985

VIOLATION ASSESSMENT

to Gil  
6-22

Elaine Baruch

(Name & title of Evaluator)

TSCA	<input checked="" type="checkbox"/>
FIFRA	<input type="checkbox"/>

Inland Empire Paper Co.  
North 3320 Argonne  
Spokane, WA. 99212

ACTION TAKEN

<input type="checkbox"/>	No Action Indicated
<input checked="" type="checkbox"/>	Notice Noncompliance
<input type="checkbox"/>	Refer for Ad. Civil Penalty
<input type="checkbox"/>	Refer for Criminal Penalty
<input type="checkbox"/>	Refer to State

4-20-89

Date of Inspection

Mike Hayes

Name of Inspector

Comments:

Facility had 30 large PCB caps in use at time of inspection, marked, no leaking. Facility formerly had two PCB-contaminated transformers, but when these two were retrofilled, co. stopped doing annual reports even though they had over 50 large caps until 1987 when some of their caps were disposed of. Should have prepared annual reports for 83, 84, 85, 86, + 87. However, no storage, disposal activities occurred in years before 87. Major recordkeeping level four, minor extent, \$1,000 per year. Recommend NON for annual reports violations plus advisory on size of PCB label.

William M. Wedge

Concur

for Sue Heselberger 7-3-89

Do not Concur

FATES INSPECTION #

DATE ENTERED

CASE #

DATE ENTERED

Reviewed 6-21-89

Inland Empire Paper Company  
North 3320 Argonne  
Spokane, Washington 99212

*Rec'd  
4-28-89*

April 20, 1989

Michael R. Hoyles, Environmental Protection Specialist  
Washington Operations Office

Compliance History:

This facility was inspected by Mike Watson on December 15, 1983. At that time the Company had 72 capacitors some of which were leaking. They also had marking violations. At the time, the company had two transformers that contained PCBs but this was not addressed in the inspection. On July 17, 1984 EPA issued a Notice of Noncompliance.

Pre-Inspection Conference:

I arrived at the facility and was introduced to Wayne Andresen, Production Manager, Ed Orr, Maintenance Supervisor, and Mike Reynolds, Chief Electrician. I presented my credentials and explained the purpose of my visit. I filled out the TSCA Notice of Inspection and Confidentiality Notice, had Wayne fill out and sign the appropriate areas, and gave him a copy of each.

Record Review:

Enclosed with this report are annual reports for 1980, 1981, and 1982. In 1984 the Company disposed of all remaining transformers and, apparently, discontinued preparing the annual reports. Until the fall of 1987, when 46 PCB capacitors were shipped for disposal (two documents are enclosed supporting this), the Company had at least 76 PCB capacitors in use. This conclusion is based on fact that they still have 30 capacitors in use. These capacitors are approximately 25 inches high, 12 inches deep, and 3 inches wide which is equivalent to 900 cubic inches. According to Mr. Reynolds they are operating at greater than 2000 volts. These would be considered large high voltage capacitors. Since prior to the end of 1987 they had more than 50 of these units, annual reports up through and including 1987 should be on file for five years after then. From this reasoning, I include they should have annual reports for 1983, 1984, 1985, 1986, and 1987.

Two transformers were disposed of in 1984. It's difficult to tell from the annual reports if they were PCB transformers or PCB contaminated ones. Since these were disposed of in 1984 they should have had quarterly inspection reports up to that date. I did not, however, ask for these since five years have passed. Quarterly inspection reports are not required for PCB capacitors.

## Inspection of Facility

We first went to the refiner motor control room (4160 volt area) and I was informed that the PCB capacitors that used to be in this area were removed and shipped in 1987. I did not ask what the dimensions were.

We then went to the 2300 volt room in which is contained 30 capacitors mounted in an area enclosed by a cyclone style fence. These were 100 KVAR capacitors with dimensions in inches of 25 H, 12D and 3W. This corresponds to 900 cubic inches. They are greater than 2000 volts. None were leaking. According to Mr. Renoylds they are inspected daily and leaks would be detected. According to Mr. Andresen the Company had tried to affix four inch ML labels but the heat from the capacitors deteriorated the labels quickly. They were able to place the labels on the structure which holds the capacitors and this gives ample warning that the units contain PCBs. **The ML labels affixed to the structure should have been 6 inches on a side.** According to Mr. Andresen, these thirty capacitors represent their total inventory of PCB items at the plant.

They do not have a storage for disposal area at this facility and their past practice was to have equipment picked up within "a couple of days of removal from service".

### Sample Collection:

None.

### Closing Discussion:

I informed those present of the need for the 6 inch by 6 inch ML label, thanked them for their time and left the facility.

While in the parking lot it occurred to me they may have an annual report violation so I returned and talked to Mr. Andresen who provided me copies of those annual reports that they had. I explained that he needed to have annual reports for the years indicated above. I thanked him and left the facility.



# PCB INSPECTION PLAN

(Must be Completed and Filed with RSCC and RQAMO for all PCB Inspections)

STATUS: Enforcement Sensitive\_\_\_\_; CBI\_\_\_\_; Open\_\_\_\_; Routine X

SITE IDENTIFIER:

Inland Empire Paper Co.

AUTHORIZED INSPECTOR: Michael R. Hoyles, Environmental Protection Specialist

DESIGNATED MANAGER: Michael R. Hoyles, Environmental Protection Specialist

INSPECTION TEAM OR DELEGATED AUTHORITIES: Michael R. Hoyles,  
Environmental Protection Specialist

RQAMO CONCURRENCE: \_\_\_\_\_ DATE \_\_\_\_\_

ESD PEER REVIEW: \_\_\_\_\_ DATE \_\_\_\_\_

Project Number: \_\_\_\_\_ Account Number: \_\_\_\_\_

Laboratory Designated: EPA\_\_\_\_; CLP\_\_\_\_; PRIVATE\_\_\_\_

Sample Numbers Assigned: \_\_\_\_\_ to \_\_\_\_\_

## SAMPLE SCHEDULE AND MILESTONES:

(This schedule must be filled out ACCURATELY and COMPLETELY)

DATE	4/20/89			
ACTIVITY	Inspection			
MATRIX				
# OF SAMPLES				

Regional Sample Control Center Review: \_\_\_\_\_

Acceptance Date: \_\_\_\_\_ "open" section(s) closed on \_\_\_\_\_

Project Description and Site Location: Inland Empire Paper Company  
North 3320 Argonne  
Spokane, Washington 99212

Sample Rationale and Network Derivation: \_\_\_\_\_

Cooperating Agencies, Involved Parties: \_\_\_\_\_

Special Considerations or "open" requirements: \_\_\_\_\_

(Continue on back if necessary)





US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 4/20/89	INSPECTOR NO. 871	DAILY SEQ. NO.	10 a	INLAND EMPIRE PAPER COMPANY
4. INSPECTOR ADDRESS 2 Ecology PU-11 OLYMPIA WA 98503			5. FIRM ADDRESS No 3320 ARSONNE Spokane, WA 99212	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME MICHAEL R HOYLES		NAME WAYNE ANDRESEN	
TITLE Asst. TSCA Coordinator	DATE SIGNED 4/20/89	TITLE PROD. MGR.	DATE SIGNED 4/20/89



U.S. ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME		
DATE 4/20/89	INSPECTOR NO. 871	DAILY SEQ. NO.	INLAND EMPIRE PAPER COMPANY		
3. INSPECTOR NAME MICHAEL R HOYLES			4. FIRM ADDRESS No. 3320 ARGONNE Spokane, WA 99212		
5. INSPECTOR ADDRESS Ecology PU-11 OLYMPIA, WA 98503			6. CHIEF EXECUTIVE OFFICER NAME CLYDE B. ANDERSON		
			7. TITLE PRESIDENT & GEN. MGR.		

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice			
SIGNATURE Wayne Andresen		NAME	
NAME WAYNE ANDRESEN		TITLE	
TITLE PROD. MGR.		ADDRESS	
DATE SIGNED 4/20/89			

~~JULY 7,~~  
FEB 9, 1983

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 82 THRU DEC. 31, 82.

As of December 31, 82 we had on hand at our Inland Empire Paper Co  
facility 3172 kilograms of PCB insulating fluids. The PCB  
fluid was located as follows:

2 - TRANSFORMERS (ITEMS #8 + #14 of EQUIPMENT LOG)  
36 - CAPACITORS (ITEMS #1-3 of EQUIPMENT LOG)  
30 - CAPACITORS (ITEM #4 of EQUIPMENT LOG)

In addition to the above we had \_\_\_\_\_ kilograms of PCB  
contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting  
period.

Signature Wayne Andresen  
Title Technical Supt.  
Date Feb 9, 1983

~~JULY 7,~~           

MARCH 11, 1982

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 81 THRU DEC. 31, 81.

As of December 31, 81 we had on hand at our Inland Empire Paper Co. facility 3172 kilograms of PCB insulating fluids. The PCB fluid was located as follows:

- 2 - TRANSFORMERS (ITEMS # 8 & #14 of EQUIPMENT LOG)
- 36 - CAPACITORS (ITEMS # 1 - 3 of EQUIPMENT LOG)
- 30 - CAPACITORS (ITEM #4 of EQUIPMENT LOG)

In addition to the above we had                      kilograms of PCB contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting period.

Signature Wayne Andresen  
Title Technical Supt.  
Date March 11, 1982

JULY 1,           

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 80 THRU DEC. 31, 80.

As of December 31, 1980 we had on hand at our IEPCo  
facility 3172 kilograms of PCB insulating fluids. The PCB  
fluid was located as follows:

2 - TRANSFORMERS (ITEMS # 8 & 14 of EQUIPMENT LOG)  
36 - CAPACITORS (ITEMS # 1-3 of EQUIPMENT LOG)  
30 - CAPACITORS (ITEM # 4 of EQUIPMENT LOG)

In addition to the above we had                      kilograms of PCB  
contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting  
period.

Signature Wagner Andersen  
Title Technical Asst.  
Date 8/1/81



**EASTERN** ELECTRIC  
APPARATUS  
REPAIR  
COMPANY, INC.

10831 EAST MARGINAL WAY SOUTH  
SEATTLE, WASHINGTON 98168  
(206) 767-9506

May 25, 1988

Inland Empire Paper Co.  
3320 North Argonne  
Spokane, WA 99212

Attn: Ed Orr

This letter is to certify that the 43 PCB capacitors delivered to Eastern Electric Apparatus Service Plant, Seattle, WA on 11-24-87 were disposed of according to 40 CFR Part 761.60 (b) (2) (iii) (A).

Attached are copies of the Texas Waste Manifest, Ticket Number 00354357, and the Certificate of Destruction in which your capacitors were included.

Should you have any questions, please feel free to call.

EASTERN ELECTRIC CORPORATION

\* 3 switches also included in this shipment

**TEXAS WATER COMMISSION**  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved, OMB No. 2050-0039, expires 9-30-88

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>WA D 980738462</b>		Manifest Document No. <b>54357</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>EASTERN ELECTRIC 10831 E. MARGINAL WAY S SEATTLE, WA. 98168</b>						A. State Manifest Document Number <b>NO. 00354357</b>							
4. Generator's Phone <b>(206) 767-9506</b>						B. State Generator's ID <b>99953</b>							
5. Transporter 1 Company Name <b>4-K</b>				6. US EPA ID Number <b>TX D980808794</b>		C. State Transporter's ID <b>TDWR 40415</b>							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone <b>(713) 477-7760</b>							
9. Designated Facility Name and Site Address <b>ROLLINS ENVIRONMENTAL SERVICES P.O. BOX 609-2027 BATTLEGROUND DEER PARK, TX. 7536</b>						E. State Transporter's ID							
10. US EPA ID Number <b>TX D055141378</b>						F. Transporter's Phone							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No.		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
X a. R.Q. HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						002 CM		4704		P		173880	
X b. R.Q. HAZARDOUS SUBSTANCE SOLID, N.O.S., ORM-E, NA 9188 (POLYCHLORINATED BIPHENYLS)						001 DM		282		P		173880	
c.													
d.													
J. Additional Descriptions for Materials Listed Above a. HO-11553 (PAIRS OF CAPACITORS) b. HO-11554-41 (PAIRS OF CAPACITORS)						K. Handling Codes for Wastes Listed Above <b>707</b>							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name <b>LARRY ROBINSON</b>						Signature <i>Larry Robinson</i>				Month Day Year <b>12/29/87</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <b>Pilar Deal-Ry</b>						Signature <i>Pilar Deal Ry</i>				Month Day Year <b>12/29/87</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name <b>RBS &amp; H Inc</b>						Signature <i>[Signature]</i>				Month Day Year <b>10/10/88</b>			



**Rollins**

MAY 5, 1988

EASTERN ELECTRIC APPARATUS REPAIR COMPANY  
10831 EAST MARGINAL WAY SOUTH  
SEATTLE, WA 98168

ATTN: Mr. Larry Robinson

Dear Mr. Robinson:

This is to certify the material referenced below was incinerated as of 04/18/88 at our Deer Park facility - Rollins Environmental Services (TX) Inc., P. O. Box 609, Deer Park, Texas 77536 in accordance with 40 CFR 761 as it pertains to incineration of PCB solids, liquids and capacitors.

TOTAL POUNDS	-4705
H. O. NUMBER	-11553-39
DATE RECEIVED	-12/29/87
RES (TX) INC. B/L NUMBER	-104256
RES (TX) INVOICE NUMBER	-154795
TWC MANIFEST NUMBER	-00354357

SINCERELY,  
RES (TX) INC.

VELMA K. SHAFFER  
PCB RECORDS ADMINISTRATOR

cc: Steve Bergersen

Please call (713) 479-6001 Ext. 212 if there are any questions concerning the information on this Certificate of Destruction.